

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

JAMEKA ELEAZER,
Plaintiff,

v.

ORACLE AMERICA, INC.,
Defendant.

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Civil Action No.: 1:24-CV-777-RP

**DEFENDANT’S OBJECTIONS AND RESPONSES TO
PLAINTIFF’S SECOND REQUESTS FOR PRODUCTION**

To: Plaintiff Jameka Eleazer (“Plaintiff”), by and through her counsel of record, Matt Bachop, Deats Durst & Owen, PLLC, 8140 N Mopac Expy, Suite 4-250, Austin, TX 78759.

Defendant Oracle America Inc. (“Defendant” or “Oracle”) serves on Plaintiff Jameka Eleazer (“Plaintiff” or “Eleazer”) its Objections and Responses to Plaintiff’s Second Requests for Production.

Respectfully submitted,

By: /s/ Edward “Ted” Smith
Edward “Ted” Smith

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on May 9, 2025, I served a copy of the foregoing via electronic mail to the following counsel of record:

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/s/ Edward “Ted” Smith
Edward “Ted” Smith

GENERAL OBJECTIONS

Defendant objects to the “Definitions and Rules of Construction” section of these requests to the extent that they purport or seek (1) the disclosure of information that is beyond the scope of discovery as provided by the Federal Rules of Civil Procedure (the “Rules”), the Local Rules of the Western District of Texas (the “Local Rules”), and/or any other applicable rule or court order, or (2) to impose a burden or requirement on Defendant in excess of those required by the Rules, the Local Rules, and/or any other applicable rule or court order. Defendant will not comply with any instructions inconsistent with, or imposing a greater burden than, the Rules and Local Rules.

Defendant’s responses to these Requests for Production do not constitute admissions or acknowledgements that any information or document sought is within the proper scope of discovery, and Defendant makes these responses without waiving its right to object to the admissibility of documents produced herewith or to object to further discovery related to subject matters encompassed within Plaintiff’s Second Requests for Production.

Defendant makes these responses to the best of its present knowledge based upon a reasonable investigation to date. Because its investigation in this action is ongoing, Defendant reserves the right to modify, supplement, or amend the responses contained herein as any additional facts may become known during the course of such investigation or discovery.

OBJECTIONS AND RESPONSES TO SECOND REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 24: Please produce all performance management logs maintained by Garrett Miller pertaining to any sales representative under his supervision at any time between June 1, 2022 and May 31, 2023.

RESPONSE: Defendant refers Plaintiff to its previous document production at ORCL_ELEAZER00000055, 431. Aside from the identified documents, Defendant has not identified additional documents responsive to this request following a diligent search.

REQUEST FOR PRODUCTION NO. 25: Please produce all territory grade files or territory go-to-market files for FY2023 for all sales representatives under Garrett Miller's supervision at any time between June 1, 2022 and May 31, 2023.

RESPONSE: Defendant responds that it will produce any responsive, non-privileged documents within its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 26: Please produce all territory review documents for FY2023 for all sales representatives under Garrett Miller's supervision at any time between June 1, 2022 and May 31, 2023.

RESPONSE: Defendant refers Plaintiff to its response to Plaintiff's Request for Production No. 17 and the accompanying document production, specifically the documents and email attachments reflecting each sales representative's territory reviews that were produced on March 18, 2025.

REQUEST FOR PRODUCTION NO. 27: Please produce the Performance Improvement Plan and termination notice for Vanessa Perez.

RESPONSE: Defendant responds that it will produce any responsive, non-privileged documents within its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 28: Please produce Defendant's EEO-1 reports from 2022 to the present.

RESPONSE: Defendant objects that this request is not reasonably crafted to be proportional to the needs of the case, is not reasonably limited in time or scope, and is impermissibly overbroad and unduly burdensome. Specifically, the request seeks documents after Plaintiff's employment with Defendant and for the entirety of Defendant's workforce. Therefore, Defendant objects because the amount in controversy does not justify the expense required to comply with the request and the burden and expense of the proposed discovery outweighs any likely benefit.

Subject to, and without waiving its objections, Defendant responds that it will produce its EEO-1 reports from 2022 through Plaintiff's termination and further limited to Defendant's Austin office.

REQUEST FOR PRODUCTION NO. 29: Please produce all documents reflecting Garrett Miller's participation in any call or meeting with Plaintiff and any customer or field representative.

RESPONSE: Defendant objects that this request is not reasonably crafted to be proportional to the needs of the case and is impermissibly overbroad and unduly burdensome.

Subject to, and without waiving its objections, Defendant responds that it will produce any responsive, non-privileged documents within its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 30: Please produce all documents reflecting Nicole Levitt's participation in any call or meeting with Plaintiff and any customer or field representative.

RESPONSE: Defendant objects that this request is not reasonably crafted to be proportional to the needs of the case and is impermissibly overbroad and unduly burdensome.

Subject to, and without waiving its objections, Defendant responds that it will produce any responsive, non-privileged documents within its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 31: Please produce all communications between Garrett Miller and any Oracle field representative in which Plaintiff is mentioned, referred to, or discussed.

RESPONSE: Defendant objects that this request is not reasonably crafted to be proportional to the needs of the case, is not reasonably limited in time or scope, and is impermissibly overbroad and unduly burdensome. Therefore, Defendant objects because the amount in controversy does not justify the expense required to comply with the request and the burden and expense of the proposed discovery outweighs any likely benefit.

Subject to, and without waiving its objections, Defendant responds that it will produce any responsive, non-privileged documents within its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 32: Please produce all communications between Nicole Levitt and any Oracle field representative in which Plaintiff is mentioned, referred to, or discussed.

RESPONSE: Defendant objects that this request is not reasonably crafted to be proportional to the needs of the case, is not reasonably limited in time or scope, and is impermissibly overbroad and unduly burdensome. Therefore, Defendant objects because the amount in controversy does not justify the expense required to comply with the request and the burden and expense of the proposed discovery outweighs any likely benefit.

Subject to, and without waiving its objections, Defendant responds that it will produce any responsive, non-privileged documents within its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 33: Please produce all documents reflecting all expansions closed from June 1, 2023, to the present in the accounts that were assigned to Plaintiff during FY2023.

RESPONSE: Defendant objects that this request is not reasonably crafted to be proportional to the needs of the case, is not reasonably limited in time or scope, and is impermissibly overbroad and unduly burdensome. Specifically, the request seeks documents after Plaintiff's employment with Defendant. Therefore, Defendant objects because the amount in controversy does not justify the expense required to comply with the request and the burden and expense of the proposed discovery outweighs any likely benefit.

Subject to, and without waiving its objections, Defendant responds that it will produce any responsive, non-privileged documents within its possession, custody, or control.